

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

Registration
X Reregistration
(under FIFRA, as amended)

EPA Reg. Number:

62719-524

Date of Issuance:

2 3 JUN 2008

Term of Issuance:

Name of Pesticide Product:

ForeFront R&P

Name and Address of Registrant (include ZIP Code):

Dow AgroSciences, LLC 9330 Zionsville Road Indianapolis, IN 46268

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is reregistered in accordance with FIFRA sec. 4(g)(2)(C) provided that you:

- 1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
- 2) To the label add "Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in <u>Washington Toxics Coalition, et al. v. EPA</u>, C0131C, (W.D. WA). For further information, please refer to EPA Web site: http://www.epa/gov/espp."

Signature of Approving Official:

Joanne J. Miller

Joanne Miller

Product Manager 23

Herbicide Branch

Registration Division (7505P)

Date:

2 3 JUN 2008

Page 2 EPA Reg. No. 62719-524

- 3) Per the product chemistry review, the nominal concentration of 2,4-D acid equivalent in the ingredient statement must be revised from 27.2% to "27.37%."
- 4) A Note to Physician must be added to the label as follows:
- "Probably mucosal damage may contraindicate the use of gastric lavage."
- 5) Revise the User Safety Recommendations section to include the following bold text:
- "User should remove clothing/PPE immediately if pesticide gets inside."
- 6) Add the following text to the Environmental Hazards text currently on the label:

"Fish breathe dissolved oxygen in the water and decaying weeds also use oxygen. When treating continuous, dense weed masses, it may be appropriate to treat only part of the infestation at a time. For example, apply the product in lanes separated by untreated strips that can be treated after vegetation in treated lanes has disintegrated. During the growing season, weeds decompose in a 2 to 3 week period following treatment. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Waters having limited and less dense weed infestations may not require partial treatments."

In addition, revise the sentence "...below the mean high water mark." to read "...below the mean high water mark except as permitted on this label."

7) The storage and disposal section must be revised to include the following:

"Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance."

In addition, the following change is recommended:

- The subheading "pesticide disposal" should be added to all versions after "pesticide storage" and before "container disposal."
- 8) With the exception of drift-related text appearing in the Environmental Hazards ("Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas") and General Precautions and Restrictions ("Do not apply this product in a way that will contact workers or other persons, either directly or through drift"), all drift text appearing on the label must be placed together and be located below the required text currently on the label. Any conflicting text must be deleted from the label.
- 9) The restrictions for **pasture and rangeland** must be identified as "Pasture and Rangeland Restrictions" in the heading.

Page 3 EPA Reg. 62719-524

Add "natural areas" to the non-cropland heading on page 25 of the label package. The following restrictions for **non-cropland and natural areas** applications must be added to the label (and delete any conflicting text unless based on more restrictive aminopyralid requirements):

"Postemergence (annual and perennial weeds):

Limited to 2 applications per year.

Maximum of 6 pints (2.0 lbs ae) /acre per application.

Minimum of 30 days between applications.

Postemergence (woody plants):

Limited to 1 application per year.

Maximum of 12 pints (4.0 lbs ae) /acre per year.

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes."

The following restrictions for **non-irrigation canal ditchbank** applications must be added to the label (and delete any conflicting text unless based on more restrictive aminopyralid requirements):

"Postemergence:

Limited to 2 applications per season.

Maximum of 6 pints (2.0 lbs ae) /acre per application.

Minimum of 30 days between applications.

Spot treatment permitted.

Do not use on small canals with a flow rate less than 10 cubic feet per second (CFS) where water will be used for drinking purposes. CFS may be estimated by using the formula below. The approximate velocity needed for the calculation can be determined by observing the length of time that it takes a floating object to travel a defined distance.

Divide the distance (ft.) by the time (sec.) to estimate velocity (ft. per sec.). Repeat 3 times and use the average to calculate CFS.

Average Width (ft.) x Average Depth (ft.) x Average Velocity (ft. per sec.) = CFS

For ditchbank weeds:

Do not allow boom spray to be directed onto water surface.

Do not spray across stream to opposite bank.

For shoreline weeds:

Allow no more than 2 foot overspray onto water."

Submit one copy of the revised final printed label for the record. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

(Base label for rigid containers 5 gal or less):

ForeFront® R&P

Specialty Herbicide

For control of broadleaf weeds, including invasive and noxious weeds, and certain woody plants on rangeland, permanent grass pastures (including grasses grown for hay), and Conservation Reserve Program (CRP) acres., non-cropland areas such as rights-of-way, roadsides, non-irrigation ditch banks, and natural areas such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails, and grazed areas in and around non-crop sites

Not For Sale, Distribution, or Use in New York State.

Group	4	HERBICIDE
Active Ingredient:		
	nonium salt of 2-py	ridine
	4-amino-3,6-dichlo	
Triisopropanolamr		
	enoxy) acetic acid.	51.06%
Other Ingredients		
-		

ACCEPTED with COMMENTS In EPA Letter Dated:

2 3 JUN 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

62719-524

Acid Equivalents:

aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) – 3.4% - 0.33 lb/gal (40 g/L) 2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.2% - 2.67 lb/gal (320 g/L)

Keep Out of Reach of Children

DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Corrosive • Causes Irreversible Eye Damage • Harmful if Swallowed

Do not get in eyes or on clothing.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selections chart.

All mixers, loaders, aApplicators, flaggers, and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Protective eyewear

Page 2

- · Chemical-resistant gloves made of any waterproof material such as natural rubber
- Chemical-resistant gloves, when applying postharvest dips or sprays to citrus, applying with any
 handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise
 exposed to the concentrate.
- Chemical resistant apron when applying postharvest dips or sprays to citrus, mixing or loading, cleaning up spils or equipment, or otherwise exposed to the concentrate

See engineering controls for additional requirements

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables <u>exist</u>, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

<u>Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)].</u>

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to aquatic invertebrates <u>and may be toxic to fish</u>. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. <u>Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.</u> Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Care should be exercised when handling 2,4-D posticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this posticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to label booklet under "Agricultural Use Requirements" in the "Directions for Use" section for information about this standard.

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. Storage below 20°F may result in formation of crystals. If product crystallizes, store at 50° to 70°F and agitate to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

<u>Container Reuse</u>: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-524

EPA Est.

Produced for Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Net Contents ___

Trademark of Dow AgroSciences LLC

(Base label for refillable rigid containers larger than 5 gal):

ForeFront® R&P

Specialty Herbicide

For control of broadleaf weeds, including invasive and noxious weeds, and certain woody plants on rangeland, permanent grass pastures (including grasses grown for hay), and Conservation Reserve Program (CRP) acres., non-cropland areas such as rights-of-way, roadsides, non-irrigation ditch banks, and natural areas such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails, and grazed areas in and around non-crop sites

Not For Sale, Distribution, or Use in New York State.

Group	4	HERBICIDE	

Active Ingredient:

Acid Equivalents:

aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) – 3.4% - 0.33 lb/gal (40 g/L) 2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.2% - 2.67 lb/gal (320 g/L)

Keep Out of Reach of Children

DANGER

PELIGRO

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Precautionary Statements

Hazards to Humans and Domestic Animals

Corrosive • Causes Irreversible Eye Damage • Harmful if Swallowed

Do not get in eyes or on clothing.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selections chart.

All mixers, loaders, aApplicators, flaggers, and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Protective eyewear

S5E / ForeFront R&P / MSTR Amend With Edits / 06-29-07

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- Chemical-resistant gloves made of any waterproof material such as natural rubber
- Chemical-resistant gloves, when applying postharvest dips or sprays to citrus, applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- Chemical resistant apron when applying postharvest dips or sprays to citrus, mixing or loading, cleaning up spils or equipment, or otherwise exposed to the concentrate

See engineering controls for additional requirements

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables <u>exist</u>, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)].

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.
 As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to aquatic invertebrates <u>and may be toxic to fish</u>. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. <u>Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.</u> Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Care should be exercised when

handling 2,4-D posticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this posticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to label booklet under "Agricultural Use Requirements" in the "Directions for Use" section for information about this standard.

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. Storage below 20°F may result in formation of crystals. If product crystallizes, store at 50° to 70°F and agitate to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

<u>Container Reuse:</u> Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container.

Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.=

Refer to label booklet for Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

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Not For Sale, Distribution, or Use in New York State.

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Active Ingredient:

 Other Ingredients
 42.36%

 Total
 100.00%

Acid Equivalents:

aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) – 3.4% - 0.33 lb/gal (40 g/L) 2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.2% - 2.67 lb/gal (320 g/L)

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Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selections chart.

All mixers, loaders, aApplicators, flaggers, and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Protective eyewear

- · Chemical-resistant gloves made of any waterproof material such as natural rubber
- Chemical-resistant gloves, when applying postharvest dips or sprays to citrus, applying with any
 handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise
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See engineering controls for additional requirements

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If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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Agricultural Use Requirements

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Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. Storage below 20°F may result in formation of crystals. If product crystallizes, store at 50° to 70°F and agitate to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

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Agricultural Use Requirements

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Refer to inside of label booklet for additional precautionary information, including Personal Protective Equipment (PPE), User Safety Recommendations and Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

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Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-524

EPA Est. ___

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Net Contents ___

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(Page 1 through end):

Precautionary Statements

Hazard to Humans and Domestic Animals

DANGER

Corrosive • Causes Irreversible Eye Damage • Harmful if Swallowed

Do not get in eyes or on clothing.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selections chart.

All mixers, loaders, aApplicators, flaggers, and other handlers must wear:

- · Long-sleeved shirt and long pants
- Shoes plus socks
- · Protective eyewear
- Chemical-resistant gloves made of any waterproof material such as natural rubber
- Chemical-resistant gloves, when applying postharvest dips or sprays to citrus, applying with any
 handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise
 exposed to the concentrate.
- Chemical resistant apron when applying postharvest dips or sprays to citrus, mixing or loading, cleaning up spils or equipment, or otherwise exposed to the concentrate

See engineering controls for additional requirements

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)].

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.
 As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to aquatic invertebrates <u>and may be toxic to fish</u>. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. <u>Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.</u> Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Mixing and Leading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/leading and disposal sites. Care should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/leading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Not For Sale, Distribution, or Use in New York State.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as natural rubber.
- Protective eyewear
- Shoes plus socks

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Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for Agricultural Pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Entry Restrictions for Non-WPS Uses: For applications on rangeland and permanent grass pastures, and non-cropland areas, dDo not enter or allow worker entry people (or pets) to enter the into treated areas until sprays have dried.

Storage and Disposal

Do not contaminate water, food, feed or fertilizer by storage or disposal. Open dumping is prohibited. **Pesticide Storage:** If this product is exposed to subfreezing temperatures, the active ingredient may crystallize and settle out of solution. Under these conditions the product should be warmed to at least 40°F and agitated well to dissolve any crystallized material prior to use.

Non-refillable containers 5 gallons or less:

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers larger than 5 gallons:

<u>Container Reuse:</u> Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container.

Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers 5 gallons or larger:

<u>Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.</u>

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tan or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal (Metal): Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Container Disposal (Plastic): Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

General: Consult federal, state or local disposal authorities for approved alternative procedures.

General Information

ForeFront® R&P specialty herbicide controls broadleaf weeds, including invasive and noxious weeds, and certain woody plants on rangeland, permanent grass pastures (including grasses grown for hay), and Conservation Reserve Program (CRP) acres., non-cropland areas such as rights-of-way, roadsides, non-irrigation ditch banks, and natural areas such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails, and grazed areas in and around non-crop sites.

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs) and transitional areas between upland and lowland sites. ForeFront R&P can be used to the waters edge. Do not apply directly to water and take precautions to minimize spray drift onto water.

Resistance Management Guidelines

- Development of plant populations resistant to this herbicide mode of action is usually not a problem on rangeland, permanent grass pastures, or CRP, non-cropland sites since these sites receive infrequent pesticide applications.
- In croplands, use an effective integrated pest management (IPM) program, integrating tillage or other mechanical methods, crop rotation or other cultural control methods into weed control programs whenever practical.
- Similar looking biotypes of a given weed species occurring in a treated area may vary in their susceptibility to a herbicide. Application of a herbicide below its recommended rate may allow more tolerant weeds to survive and a shift to more tolerant biotypes within the treated area.
- Where identified, spreading of resistant weeds to other fields may be prevented by cleaning harvesting and tillage equipment before moving to other areas and by planting weed-free seed.
- Contact your extension specialist, certified crop consultant, or Dow AgroSciences representative for the latest resistance management information.

Use Precautions and Restrictions

This product is not intended for reformulation or repackaging into other end-use products.

Restrictions

- Preharvest Interval: Do not cut forage for hay within 7 days of application. For program lands, such as CRP, consult program rules to determine whether grass or hay may be used. The more restrictive requirements of the program rules or this label must be followed.
- Maximum seasonal rate: Apply no more than 84 fl oz (1.75 lbs acid equivalent 2,4-D) per acre per use season
- Use 2 or more gallons of spray solution per acre
- Do not make more than two applications per year
- Do not apply within 30 days of previous application
- If grass is to be cut for hay, Agricultural Use Requirements for the Worker Protection Standard are applicable

- Maximum Application Rate: Do not broadcast apply more than 42 fl oz (2.6 pints) (0.87 lbs acid equivalent) per acre of ForeFront R&P per year. The total amount of ForeFront R&P applied broadcast, as a re-treatment, and/or spot treatment per year must not exceed 42 fl oz (2.6 pints) (0.87 lbs acid equivalent) per acre. Spot treatments may be applied at an equivalent broadcast rate of up to 84 fl oz of ForeFront R&P (1.75 lbs acid equivalent) per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate.
- Avoiding Injury to Non-Target Plants: Do not aerially apply ForeFront R&P within 50 feet of a border downwind (in the direction of wind movement), or allow spray drift to come in contact with, any broadleaf crop or other desirable broadleaf plants, including, but not limited to, alfalfa, cotton, dry beans, flowers, grapes, lettuce, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes or other broadleaf or vegetable crop, fruit trees, ornamental plants, or soil where sensitive crops are growing or will be planted. Avoid application under conditions that may allow spray drift since very small quantities of spray may seriously injure crops. Read and consider the Precautions for Avoiding Spray Drift Management section and Spray Drift Advisory at the end of this label to help minimize the potential for spray drift.
- ForeFront R&P is highly active against many broadleaf plant species. Do not use this product on areas where loss of desirable broadleaf forage plants, including legumes, cannot be tolerated.
- Chemigation: Do not apply this product through any type of irrigation system.
- **Do not contaminate water intended for irrigation or domestic purposes.** Do not treat inside banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes.
- Forefront R&P should not be applied on residential or commercial lawns or ornamental plantings.
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of ForeFront R&P
 through movement into the soil. Do not apply ForeFront R&P within the root zone of desirable trees
 unless such injury can be tolerated. Use special caution near roses, and leguminous trees such as
 locusts, redbud, mimosa, and caragana.
- **Crop Rotation:** Do not rotate non-cropland to cropland for one year following an application of ForeFront R&P. Do not plant a broadleaf crop until an adequately sensitive field bioassay shows that the level of aminopyralid present in the soil will not adversely affect that broadleaf crop.
- Seeding grasses:
 - Preemergence: ForeFront R&P may be applied in the spring or early summer, depending on the target weed species, and grass planted in the fall when conditions are favorable for grass establishment.
 - Postemergence: During the season of establishment, ForeFront R&P should be applied only after perennial grasses are well established (have developed a good secondary root system and show good vigor). Most perennial grasses are tolerant to ForeFront R&P at this stage of development. ForeFront R&P may suppress certain established grasses, such as smooth bromegrass (*Bromus inermis*), especially when plants are stressed by adverse environmental conditions. Plants should recover from this transient suppression with the onset of environmental conditions favorable to grass growth and upon release from weed competition.
- Seeding Legumes: Do not plant forage legumes until a soil bioassay has been conducted to determine if aminopyralid residues remaining in the soil will adversely affect the legume establishment.
- Grazing and Haying Restrictions: Do not harvest forage for hay within 7 days of ForeFront R&P application. Cutting hay too soon after spraying weeds can compromise the weed control. Wait 14 days prior to cutting grass hay to allow for maximum herbicide activity. Do not transfer grazing animals from areas treated with ForeFront R&P to areas where sensitive broadleaf crop occur without first allowing 3 days of grazing on an untreated pasture. Otherwise, urine and manure may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- Aminopyralid in Plant Residues or Manure:
 - Do not use aminopyralid-treated plant residues, including hay or straw from treated areas, or manure from animals that have grazed forage or eaten hay harvested from treated areas within the previous 3 days, in compost or mulch that will be spread to areas where commercially grown mushrooms or broadleaf plants may be grown.

- Do not spread manure from animals that have grazed or consumed forage or hay from treated areas within the previous 3 days on land used for growing broadleaf crops.
- Manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas within the previous 3 days may only be used on pasture grasses, grass grown for seed, and wheat.
- Do not plant a broadleaf crop in fields treated in the previous year with manure from animals that
 have grazed forage or eaten hay harvested from aminopyralid-treated areas until an adequately
 sensitive field bioassay is conducted to determine that the aminopyralid residues in the soil is at
 level that is not injurious to the crop to be planted.
- To promote herbicide decomposition, plant residues should be evenly incorporated in the surface soil or burned. Breakdown of aminopyralid in plant residues or manure is more rapid under warm, moist soil conditions and may be accelerated by supplemental irrigation.
- Field Bioassay Instructions: In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, rainfall pattern or drainage. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended rotational crop. Observe the test crop for symptoms of herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the intended rotational crop; plant only to wheat, forage grasses, native grasses or grasses grown for hay.

Sprayer Clean-Out Instructions

It is recommended that separate spray equipment be used on highly sensitive crops such as tobacco, soybeans, peanuts, and tomatoes.

Do not use spray equipment used to apply ForeFront R&P for other applications to land planted to, or to be planted to, crops or desirable sensitive plants, unless it has been determined that all residues of this herbicide has been removed by thorough cleaning of equipment.

Equipment used to apply ForeFront R&P should be thoroughly cleaned before reusing to apply any other chemicals as follows.

- 1. Rinse and flush application equipment thoroughly after use. Dispose of rinse water away from water supplies.
- 2. Rinse a second time, adding 1 quart of household ammonia or tank cleaning agent for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15 to 20 minutes). Let the solution stand for several hours, preferably overnight.
- 3. Flush the solution out of the spray tank through the boom.
- 4. Rinse the system twice with clean water, recirculating and draining each time.
- 5. Spray nozzles and screens should be removed and cleaned separately.

Application Methods

Apply the recommended rate of ForeFront R&P as a coarse low-pressure spray. **Do not apply this** product with mist blower systems that deliver very fine spray droplets. Use of mist blower equipment can reduce weed control and increase spray drift potential.

Spray volume should be sufficient to uniformly cover foliage. Increase spray volume to ensure thorough and uniform coverage when target vegetation is tall and/or dense. To enhance foliage wetting and coverage, an approved non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant label.

Ground Broadcast Application: Higher spray volumes (greater than 10 gallons per acre) generally provides better coverage and better control, particularly in dense and/or tall foliage.

Aerial Broadcast Application: Do not apply less than 2 gallons per acre total spray volume. Five gallons per acre or greater will generally provide better coverage and better control, particularly in dense and/or tall foliage.

High-Volume Foliar Application: High volume foliar treatments may be applied at rates equivalent to broadcast up to a maximum of 42 fl oz (2.6 pints) per acre per annual growing season. Use sufficient spray volume to thoroughly and uniformly wet foliage and stems.

Spot Application: Spot treatments may be applied at rates equivalent to broadcast-applied rate of up to a maximum of 84 fl oz (5.2 pints) on 50% of the treated field. Spray volume should be sufficient to thoroughly and uniformly wet weed foliage. Repeat treatments may be made, but the total amount of ForeFront R&P applied must not exceed 42 fl oz (2.6 pints) per acre per year (see comments in the Use Precautions and Restrictions section above on Maximum Application Rate).

Table 1: Amount of ForeFront R&P herbicide (in fl oz) to mix in 3 gallon of water

Forefront R&P Amount (In fl oz) To Mix In 3 Gal Of Water With Various Application Rates

GPA	24 fl oz/A	32 fl oz/A	42 fl oz/A
20	3.6	4.8	6.3
30	2.4	3.2	4.2
40	1.8	2.4	3.2
50	1.4	1.9	2.5
60	1.2	1.6	2.1
70	1.0	1.4	1.8
80	0.9	1.2	1.6
90	0.8	1.1	1.4
100	0.7	1.0	1.3

Table 12: Application rates in the table below are based on treating an area of 1000 sq ft. An area of 1000 sq ft is about 10.5 by 10.5 yards in size. Mix the amount of ForeFront R&P (fl oz or milliliters) corresponding to the desired broadcast rate in 0.5 to 2.5 gallons of water, depending upon the spray volume required to treat 1000 sq ft. A delivery volume of 0.5 gallons per 1000 sq ft is equivalent to 22 gallons per acre and 2.5 gallons per 1000 sq ft is equivalent to 109 gallons per acre.

Amount of For	eFront R&P per 1	000 sq ft to Equal B	roadcast Rate
Broadcast Rate		Amount of Fore	•
(fl oz/acre)	(pt/acre)	(fl oz)	(mL)
24	1.5	0.55	16.3
32	2	0.74	21.7
42	2.6	0.96	28.5

Note: 1 mL = 1cc and 1 fluid ounce (fl oz) = 29.6 milliliters (mL) = 2 tablespoons = 6 teaspoons

To calculate the amount of ForeFront R&P for areas larger than 1000 sq ft: Multiply the table value (fl oz or milliliters) by the area to be treated in "thousands" of square feet. For example, if the area to be treated is 3500 sq ft, multiply the table value by 3.5 (3500 sq ft divided by 1000 sq ft = 3.5).

Mixing Instructions

Mixing with Water

To prepare the spray, add about half the required amount of water in the spray tank. Then, with agitation, add the recommended amount of ForeFront R&P and other registered tank mix herbicides. Finally, with

continued agitation, add the rest of the water and additives such as surfactants or drift control and deposition aids.

Addition of Surfactants or Adjuvants on All Labled Use Sites: The addition of a high quality non-ionic surfactant (of at least 80% active ingredient) at 0.25 to 0.5 % volume per volume (1 to 2 quarts per 100 gallons of spray) is recommended to enhance herbicide activity under adverse environmental conditions (such as, high temperature, low relative humidity, drought conditions, dusty plant surfaces) or when weeds are heavily pubescent or more mature.

Tank Mixing with Other Herbicides

ForeFront R&P at rates of up to 42 fl oz (2.6 pints) per acre may be mixed with labeled rates of other labeled herbicides to broaden the spectrum of weeds controlled or to improve control of certain weeds. ForeFront R&P may be applied in tank mix combination with labeled rates of other herbicides provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the registered tank mixed products, and (3) that the tank mix combination is physically compatible (see tank mix compatibility testing below). When tank mixing, use only in accordance with the restrictions, precautions and limitations on the respective product labels

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed recommended application rates. If products containing the same active ingredient are mixed, do not exceed the maximum allowable active ingredient use rates.
- For direct injection or other spray equipment where the product formulations will be mixed in undiluted form, special care should be taken to ensure tank mix compatibility.
- Always perform a jar test to ensure the compatibility of products to be used in tank mixture.

Tank Mixing Precautions:

- For products packaged in water soluble packaging, do not tank mix with products containing boron or mix in equipment previously used to apply a product mixture containing boron unless the tank and spray equipment has been adequately cleaned. (See Sprayer Clean-Out instructions.)
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.

Tank Mix Compatibility Testing: Perform a jar test prior to mixing in a spray tank to ensure compatibility of ForeFront R&P and other pesticides or carriers. Use a clear glass jar with lid and mix ingredients in the same order and proportions as will be used in the spray tank. The mixture is compatible if the materials mix readily when the jar is inverted several times. The mixture should remain stable after standing for 1/2 hour or, if separation occurs, should readily mix if agitated. An incompatible mixture is indicated by separation into distinct layers that do not readily remix when agitated and/or the presence of flakes, precipitates, gels, or heavy oily film in the jar. Use of an appropriate compatibility agent may resolve mix incompatibility.

Mixing with Sprayable Liquid Fertilizer Solutions

ForeFront R&P is usually compatible with liquid fertilizer solutions. It is anticipated that ForeFront R&P will not require a compatibility agent for mixing with fertilizers; however, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer or pesticide is used, when water sources change, or when tank mixture ingredients or concentrations are changed. Compatibility may be determined by mixing the spray components in the desired order and proportions in a clear glass jar before large scale mixing of spray components in the spray tank. Use of a compatibility agent is recommended to help obtain and maintain a uniform spray solution during mixing and application.

Note: The lower the temperature of the liquid fertilizer, the greater the likelihood of mixing problems.

Mixing ForeFront R&P in N-P or N-P-K liquid fertilizer solutions is more difficult than mixing with straight nitrogen fertilizer and should not be attempted without first conducting a successful compatibility jar test. Agitation in the spray tank must be vigorous to be comparable with jar test

agitation. Apply the spray mixture the same day it is prepared while maintaining continuous agitation. Rinse the spray tank thoroughly after use.

Note: Foliar-applied liquid fertilizers themselves can cause yellowing of the foliage of forage grasses and other vegetation. The addition of a surfactant to these fertilizer blends may increase the yellowing of the forage grasses.

Use Rates and Timing

Do not use ForeFront R&P if loss of legumes species or other broadleaf species cannot be tolerated.

ForeFront R&P may be applied postemergence as a broadcast spray or as a spot application to control weeds listed on this label; weeds other than those listed may also be controlled by this herbicide. When a rate range is given, use a higher rate in the range to control weeds at advanced growth stages or under less-than-favorable growing conditions (e.g., drought stress) or for longer residual control. Best weed control results are obtained when spray volume is sufficient to provide uniform coverage of treated plants. For optimum uptake and translocation of the herbicide, avoid mowing, haying, shredding, burning or soil disturbance in treated areas for at least 7 days following application.

ForeFront R&P also provides preemergence control of germinating seeds or emerging seedlings of susceptible weeds and re-growth of certain perennial weeds following application. Weed establishment following ForeFront R&P application will depend upon application rate, season of application, and growing condition.

ForeFront R&P can provide long-term control of weeds. The length of control is dependent upon the application rate, condition and growth stage of target weeds, environmental conditions at and following application, and the density and vigor of competing desirable vegetation. Long-term broadleaf weed control is most effective where forage grasses are allowed to recover from overgrazing, drought, etc., and compete with weeds.

ForeFront R&P can be an important component of integrated vegetation management programs designed to renovate or restore desired non-cropland plant communities. To maximize and extend the benefits of weed control provided by ForeFront R&P, it is important that vegetation management practices, including grazing management, biological control agents, replanting, fertilization, prescribed fire, reseeding with desirable plants, etc., be used to increase the competitiveness of desired forages. Used as part of an integrated management program, ForeFront R&P can serve as a catalyst for rapid improvement of rangeland, permanent grass pasture, and CRP, and non-cropland sites by alleviating the adverse competitive effect of weeds on the yield and quality of forages and other desirable plant species. Agricultural and natural resources specialists with federal and state government agencies can provide guidance on best management practices and development of integrated vegetation management systems.

Broadleaf Weeds Controlled

The following weeds will be controlled at 1.5 to 2.6 pint/acre. For best results, apply when weeds are actively growing and conditions favorable for plant growth. Use a higher rate in the rate range when growing conditions are less than favorable, when weeds are mature, or when weed foliage is tall and dense or when residual control is important. ForeFront R&P also provides preemergence control of germinating seeds or emerged seedlings of susceptible weeds following application.

Table 23: Broadleaf Weeds Controlled

	Weed Specie	es .	
Common Name	Scientific Name	Life Cycle***	Plant Family
	Rate Range: 1.5 to 2 p	ints/acre	
bedstraw	Galium spp.	perennial	Rubiaceae

bedstraw, smooth	Galium mollugo	perennial	Rubiaceae
carrot, wild*	Daucus carota	biennial	Apiaceae
Cinquefoil, hoary	Potentilla argentea	perennial	Rosaceae
cinquefoil, sulfur*,**	Potentilla recta	perennial	Rosaceae
clover, sweet	Melilotus officinalis	biennial	Fabaceae
			
clover, white crownvetch*	Trifolium repens	perennial	Fabaceae
	Securigera varia	perennial	Fabaceae
daisy, oxeye*,**	Leucanthemum vulgare	perennial	Asteraceae
falsedandelion, Carolina*	Pyrrhopappus carolinianus	annual/biennial	Asteraceae
gumweed, curlycup	Grindelia squarrosa	biennial	Asteraceae
horsenettle, Carolina*,**	Solanum carolinense	perennial	Solanaceae
pokeweed, common	Phytolacca americana	perennial	Phytolaccaceae
ragweed, common*,**	Ambrosia artemisiifolia	annual	Asteraceae
ragweed; western	Ambrosia psilostachya	perennial	Asteraceae
ragwort, tansy*,***	Senecio jacobaea	perennial	Asteraceae
starthistle, yellow*,***	Centaurea solstitialis	annual	Asteraceae
thistle, bull*,**	Cirsium vulgare	biennial	Asteraceae
thistle, musk*,**	Carduus nutans	biennial	Asteraceae
thistle, plumeless*,**	Carduus acanthoides	biennial	Asteraceae
thistle, scotch	Onopordum acanthium	biennial	Asteraceae
vetch, common*	Vicia sativa	annual	Fabaceae
woodsorrel, yellow*	Oxalis stricta	perennial	Oxalidaceae
wormwood, absinth*,**	Artemisia absinthium	perennial	Asteraceae
	Rate Range: 2 to 2.6 pir	nts/acre	·
actinomeris, wingstem	Verbesina alternifolia	perennial	Asteraceae
amaranth, spiny*	Amaranthus spinosus	annual	Amaranthaceae
broomweed, annual*	Amphiachyris dracunculoides	annual	Asteraceae
burdock, common*,**	Arctium minus	biennial	Asteraceae
buttercup, hairy*	Ranunculus sardous	perennial	Ranunculaceae
buttercup, tall*,**	Ranunculus acris	perennial	Ranunculaceae
camphorweed*	Heterotheca subaxillaris	annual	Asteraceae
chickweed, common*	Stellaria media	annual	Caryophyllaceae
chicory*	Cichorium intybus	perennial	Asteraceae
cocklebur*	Xanthium strumarium	annual	Asteraceae
croton, woolly*,**	Croton capitatus	annual	Euphorbiaceae
cudweed, purple	Gnaphalium purpureum	annual	Asteraceae
dandelion, common*	Taraxacum officinale	perennial	Asteraceae
dock, broadleaf*	Rumex obtusifolius	perennial	Polygonaceae
dock, curly*	Rumex crispus	perennial	Polygonaceae
dogfennel***	Eupatorium capillifolium	perennial	Asteraceae
evening primrose, cutleaf*	Oenothera laciniata	annual	Asteraceae
false dandelion, Carolina*	Tragopogon dubius	biennial	Asteraceae
fiddleneck, common	Amsinckia intermedia	annual	Boraginaceae
fireweed	Epilobium angustifolium	perennial	
fleabane, annual*			Onagracee
	Erigeron annus	annual	Asteraceae
goldenrod, Canada*	Solidago canadensis	perennial	Asteraceae
goldenrod, Missouri*	Solidago missouriensis	perennial	Asteraceae
goldenrod, rigid	Solidago rigida	perennial	Asteraceae
hawkweed, orange*,**	Hieracium aurantiacum	perennial	Asteraceae
hawkweed, yellow*,**	Hieracium pratense	perennial	Asteraceae

henbit*	Lamium amplexicaule	annual/biennial	Lamiaceae
horseweed*	Conyza canadensis	annual	Asteraceae
ironweed, tall	Vernonia gigantea	perennial	Asteraceae
ironweed, western	Vernonia baldwinii	perennial	Asteraceae
knapweed	Centaurea sp.	biennial	Asteraceae
knapweed, brown	Centaurea jacea	perennial	Asteraceae
knapweed, diffuse*,**	Centaurea diffusa	biennial	Asteraceae
knapweed, Russian*,**	Acroptilon repens	perennial	Asteraceae
knapweed, spotted*,**	Centaurea stoebe	biennial	Asteraceae
kudzu*,**	Pueraria montana	perennial	Fabaceae
lambsquarters, common*	Chenopodium album	annual	Chenopodiaceae
lespedeza, annual	Lespedeza striata	annual	Fabaceae
lettuce, prickly*	Lactuca serriola	annual	Asteraceae
locust	Robinia pseudoacacia	perennial	Fabaceae
marshelder, annual*	Iva annua	annual	Asteraceae
mayweed, scentless*	Tripleurospermum perforata	annual	Asteraceae
mayweed, stinking*,**	Anthemis cotula	annual	Asteraceae
medic, black*	Medicago lupulina	perennial	Fabaceae
mexicantea	Dysphania ambrosioides	annual/	Chenopodiaceae
		perennial	
mullein****	Verbascum spp.	biennial	Scrophulariaceae
partridgepea*	Chamaecrista fasciculata	annual	Fabaceae
plantain, broadleaf*	Plantago major	perennial	Plantaginaceae
plantain, buckhorn*	Plantago lanceolata	perennial	Plantaginaceae
sicklepod*	Senna obtusifolia	annual	Fabaceae
smartweed, Pennsylvania	Polygonum pensylvanicum	annual	Polygonaceae
sneezeweed, bitter*	Helenium amarum	annual	Asteraceae
soda apple, tropical*,**	Solanum viarum	perennial	Solanaceae
sowthistle, perennial*,**	Sonchus arvensis	perennial	Asteraceae
sowthistle, prickly*	Sonchus asper	annual	Asteraceae
Spanish needles	Bidens bipinnata	annual	Asteraceae
starthistle, yellow*,**	Centaurea solstitialis	annual	Asteraceae
sunflower, common*	Helianthus annua	annual	Asteraceae
teasel*	Dipsacus spp.	biennial	Dipsacaceae
thistle, Canada*,**	Cirsium arvense	perennial	Asteraceae
vervain, blue*	Verbena hastata	perennial	Asteraceae
vervain, hoary*	Verbena stricta	perennial	Asteraceae
yarrow, common*	Achillea millefolium	perennial	Asteraceae

^{*}These plants are indicated to be invasive in the USDA-NRCS, PLANTS Database (http://plants.usda.gov/index.html).

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast, chemigation) can influence pesticide

^{**}Plants designated as noxious weeds in at least one state (PLANTS Database, USDA-NRCS, http://plants.usda.gov/index.html).

^{***}Spot treatment at rates up to 84 fl oz (5.2 pints) of ForeFront R&P may be particularly effective against dense patches of perennial broadleaf plants.

^{****} apply during rosette stage

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drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

When applying sprays that contain 2,4-D as the sole active ingredient, or when applying sprays that contain 2,4-D mixed with active ingredients that require a Coarse or coarser spray, apply only as a Coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a Medium or more fine spray, apply only as a Medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors ontarget deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind. If applying a Medium spray, leave one swatch unsprayed at the downwind edge of the treated field.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, fruit trees, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that may not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2.4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Aerial Application

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.

Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety. This requirement does not apply to forestry or rights-of-way applications.

When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

Ground Boom Application

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

Precautions for Avoiding Spray Drift

Avoid application under conditions that may allow spray drift because very small quantities of spray, which may not be visible, may seriously injure crops. This product should be applied only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops and other plants) is minimal (e.g., when wind is blowing away from the sensitive areas. A drift control aid may be added to the spray solution to further reduce the potential for drift. If a drift control aid is used, follow the use directions and precautions on the manufacturer's label. Do not use a thickening agent with Microfoil, Thru-Valve beoms, or other spray delivery systems that cannot accommodate thickened spray solutions.

Ground Equipment: With ground equipment, spray drift can be lessened by keeping the spray beem as low as possible; by applying 10 gallons or more of spray per acre; by keeping the operating spray pressures at the manufacturer's recommended minimum pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when the wind velocity is low (follow state regulations). Avoid calm conditions which may be conducive to thermal inversions. Direct sprays no higher than the tops of target vegetation and keep spray pressures low enough to provide coarse spray droplets to minimize drift.

Aerial Application: Avoid spray drift at the application site. The interaction of many equipment-andweather-related factors determine the potential for spray drift. Users are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications:

- 1. The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or 85% of rotor diameter.
- 2. Nozzles should be pointed backward parallel with the air stream or not pointed downwards more than 45 degrees.

State regulations must be followed.

The applicator should be familiar with and take into account the information covered in the following **Aerial Drift Reduction Advisory**. This information is advisory in nature and does not supersede mandatory label requirements.

Aerial Drift Reduction Advisory

Information on Droplet Size: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size:

- Volume Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle
 types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow
 rate nozzles instead of increasing pressure.
- Number of Nozzles Use the minimum number of nozzles that will provide uniform coverage.
- Nozzle Orientation Orienting nozzles so that the spray is released parallel to the airstream
 produced larger droplets than other orientations and is the recommended practice. Significant
 deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type Use a nozzle type that is designed for the intended application. With most nozzle
 types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream
 nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length: For some use patterns, reducing the effective boom length to less than 85% of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain such as valleys and ravines can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity: When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions: Applications should not occur during a local, low level temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of the smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Non-Cropland Areas

Restrictions:

Postemergence (annual and perennial weeds):

- Do not make more than two applications per year
- Maximum of 42 fl oz (0.87 lbs ae/acre 2,4-D per application
- Minimum of 30 days between application
- Use 2 or more gallons of spray solution per acre

Postemergence (woody plants)

- Limited to 1 application per year
- Maximum of 42 fl oz (0.87 lbs ae/acre 2.4-D per year)
- Use 2 or more gallons of spray solution per acre

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

ForeFront R&P may be applied alone or in tank mix combination to non-cropland areas, such as non-irrigation ditch banks, industrial and storage areas, airports, roadsides, railroad and utility rights-of-way,

including grazed areas on these sites as an aerial or ground broadcast treatment, as a spot application, or as a high volume foliar application (see Application Methods section). Refer to the Broadleaf Weeds Controlled section for application rates recommended for specific broadleaf weeds.

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